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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In re: Fight Pass Auto-Renewal Litigation

This Document Relates To: All Actions

Case No. 2:23-cv-00802-CDS-EJY

Member Case Nos: 2:23-cv-01211-CDS-EJY
2:23-cv-01259-CDS-EJY

**ORDER GRANTING JOINT
STIPULATION TO EXTEND
DEFENDANTS' RESPONSE DEADLINE
TO PLAINTIFFS' CONSOLIDATED
COMPLAINT [ECF 71] PENDING
MEDIATION**

(First Request)

1 Pursuant to LR IA 6-1, Plaintiffs Moises Reza, Frank Garza, Tanner Pendergraft, Federico
2 Navarrete, Isaiah Sanchez and Saul Garcia and Defendants Zuffa, LLC, (“Zuffa”) and NeuLion
3 USA, LLC, by and through their undersigned counsel of record in this matter, stipulate and agree as
4 follows:

5 WHEREAS, on October 11, 2022, Plaintiffs filed this action in the Superior Court of the
6 State of California, for the County of Alameda, entitled Moises Reza, Frank Garza, Tanner
7 Pendergraft, and Federico Navarrete, on behalf of themselves, all others similarly situated, against
8 Zuffa, LLC a Nevada limited liability company; and NeuLion USA, LLC, a Delaware limited
9 liability company, and DOES 1-50, inclusive, Case No. 22cv019499 (the “Complaint”);

10 WHEREAS, Plaintiffs filed a Consolidated Class Action Complaint on December 8, 2023
11 [ECF 71];

12 WHEREAS, Defendants response deadline is currently January 8, 2024;

13 WHEREAS, the parties have been in discussions to mediate the dispute;

14 WHEREAS, on January 5, 2024, the parties agreed to mediate the dispute before Honorable
15 Peggy A. Leen [Ret.];

16 WHEREAS, Honorable Leen has availability to mediate on February 26-28, 2024, and the
17 parties are finalizing availability to mediate on those dates;

18 WHEREAS, the parties have reached a stipulation and agreed upon a briefing schedule for
19 responding to the Consolidated Class Action Complaint, pending mediation, and subject to approval
20 of the Court;

21 WHEREAS, postponing the parties’ briefing schedule to take place after mediation, the
22 parties seek to expedite resolution of this complicated, putative class action case, avoid burdening the
23 Court with potentially unnecessary briefing, and are hopeful Honorable Leen will assist in
24 streamlining and/or resolving issues in dispute;

25 WHEREAS, this joint stipulation shall not be deemed a waiver of any rights or defenses by
26 any party, including, but not limited to, the right of Defendants to raise jurisdiction issues or to file
27 any motion to dismiss, or any other motion, or for Plaintiffs to oppose such motions;
28

1 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between Plaintiffs and
2 Defendants respective counsel, that:

- 3 1. Defendants' response to the Consolidated Class Action Complaint currently due January
4 8, 2024, is vacated and in the event the parties' February 26-28, 2024, mediation is
5 unsuccessful, Defendants shall file any motion to dismiss or response on or before
6 Wednesday, March 6, 2024;
- 7 2. The deadline for filing any opposition and reply briefs, and selection of a hearing date,
8 shall follow the Local Rules and applicable Standing Orders of this Court.

9
10 Dated: January 5, 2024

HOLLAND & KNIGHT LLP

11 s/ Dan Kappes

12 Attorneys for Defendants
Zuffa, LLC and NeuLion USA, LLC

13
14 Dated: January 5, 2024

CROSNER LEGAL

15 s/Chad Saunders

16 Attorneys for Plaintiffs Moises Reza, Frank Garza,
Tanner Pendergraft

17 Dated: January 5, 2024

BURSOR & FISHER, P.A

18 s/Timothy Fisher

19 Attorneys for Plaintiff Isaiah Sanchez

20 Dated: January 5, 2024

ZIMMERMAN REED LLP

21 s/Zachary Freese

22 Attorneys for Plaintiff Saul Garcia

23
24 **IT IS SO ORDERED:**

25
26 
UNITED STATES DISTRICT JUDGE

27 DATED: January 8, 2024
28